

ORIGINAL

U.S. DISTRICT COURT  
NORTHERN DIST. OF TX  
FT. WORTH DIVISION

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

2015 NOV -3 PM 1:28  
CLERK OF COURT

AV POLO RUN LIMITED D/B/A  
AV STEEPLECHASE LLC  
Plaintiff,

V.

MICHIAL PATRICK, LUZ VERONICA  
SANCHEZ, AND ALL OCCUPANTS  
Defendants.

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Civil No. 4:15-cv-00795-A

**PLAINTIFF'S MOTION TO REMAND**

1. AV Polo Run Limited d/b/a AV Steeplechase, LLC ("Plaintiff") files this Plaintiff's Motion to Remand pursuant to 28 U.S.C. § 1447(c) and would respectfully show unto the Court the following:

**I. Introduction**

2. On October 5, 2015 Plaintiff instituted a forcible detainer and entry action against Michial Patrick, Luz Veronica Sanchez, and All Occupants ("Defendants") in the Justice Court, Precinct Eight, Tarrant County, Texas, cause no. JP08-15-E00083492.
3. Plaintiff's action sought relief against Defendants pursuant to Chapter 24 of the Texas Property Code.
4. On October 21, 2015 Defendant Michial Patrick filed a Notice of Removal.

**II. Summary of Relief Sought**

5. Plaintiff respectfully requests the Court remand this case back to the Justice Court, Precinct Eight, Tarrant County, because Defendants failed to meet their burden to establish that

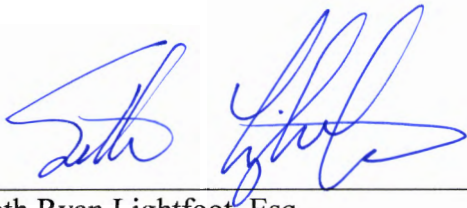
federal jurisdiction exists. Furthermore, Plaintiff should be awarded its attorney fee's against Defendant Michial Patrick, because his removal of this action is meritless and unsupported by clearly established law.

**Conclusion and Prayer**

6. WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully requests the Court remand this proceeding to the Justice Court, Precinct Eight, Tarrant County, Texas; award Plaintiff attorney fees in the amount of \$2,000.00 against Defendant Michial Patrick; and grant Plaintiff any and all further relief, at law and in equity, to which Plaintiff may be justly entitled.

Dated: November 2, 2015

Respectfully submitted,  
Huhem Law Firm, PLLC

A handwritten signature in blue ink, appearing to read 'Seth Lightfoot', is written over a horizontal line.

Seth Ryan Lightfoot, Esq.  
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Fort Worth, Texas 76112  
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ATTORNEY FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

I, Seth Ryan Lightfoot, certify that today, November 2, 2015, a copy of the above and foregoing was served upon Defendant Michial Patrick and Defendant Luz Veronica Sanchez at the addresses below via U.S. certified mail, return receipt requested, in accordance with the federal rules of civil procedure.

Via CMRRR: 7015 1660 0000 9975 3720  
Michial Patrick  
7509 Seattle Slew, Apt. 1115  
Fort Worth, Texas 76112  
*Defendant*

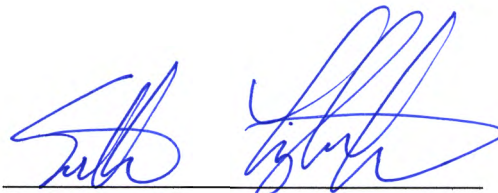
Via CMRRR: 7015 1660 0000 9975 3713  
Luz Veronica Sanchez  
7509 Seattle Slew, Apt. 1115  
Fort Worth, Texas 76112  
*Defendant*



Seth Ryan Lightfoot, Esq.  
Attorney for Plaintiff

**CERTIFICATE OF CONFERENCE**

I, Seth Ryan Lightfoot, certify that on November 2, 2015 a conference was held between Defendant Michial Patrick and Seth Ryan Lightfoot, Attorney for Plaintiff, regarding this motion. An agreement could not be reached and this motion remains opposed by Defendant Michial Patrick.



Seth Ryan Lightfoot, Esq.  
Attorney for Plaintiff